

JAP:EEA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JESSICA GARCIA,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SCOTT SALAMON, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about November 1, 2016, within the Eastern District of New York and elsewhere, the defendant JESSICA GARCIA, together with others, did conspire to import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Section 963).

The source of your deponent's information and belief are as follows:¹

1. Pursuant to an ongoing narcotics investigation, on November 1, 2016, HSI Special Agents along with Special Agents from the Drug Enforcement Administration

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

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COMPLAINT

(21 U.S.C. § 963)

(“DEA”) were conducting surveillance in the vicinity of the Grand Concourse in the Bronx, New York. At approximately 7 p.m., agents observed the defendant JESSICA GARCIA sitting in the rear seat of a vehicle (the “vehicle”) double-parked in the vicinity of Concourse Village West and 159th Street. Agents observed a van pull up behind the vehicle. The driver of the van approached the vehicle carrying a bag. The driver of the van opened the rear door of the vehicle and shortly thereafter, closed the door and returned to the van without the bag.


2. Special Agents subsequently approached the vehicle. The driver of the vehicle gave agents consent to search the vehicle. Agents discovered approximately 1.152 kilograms of a tan powdery substance that tested positive for the presence of heroin, located under the driver’s seat in the rear of the vehicle where the defendant JESSICA GARCIA had been sitting, inside a bag that appeared to be the same bag that the agents saw the driver of the van carrying to the vehicle.

3. Special Agents arrested the defendant JESSICA GARCIA and advised her of her Miranda rights. The defendant acknowledged understanding her Miranda rights and agreed to speak with law enforcement without an attorney present. In sum and substance and in part, the defendant stated that she knew that she was picking up narcotics sent by an individual in Ecuador to give to another individual. She further stated that she had picked up money and narcotics on previous occasions. She further stated that she believed that the narcotics were mailed from Ecuador via express consignment packages.

4. Based upon my training and experience, all express consignment packages that are mailed to New York, New Jersey or Connecticut from a foreign country arrive initially in the United States at JFK airport in Queens, New York.

WHEREFORE, your deponent respectfully requests that the defendant
JESSICA GARCIA, be dealt with according to law.

Dated: Brooklyn, New York
November 2, 2016



SCOTT SALAMON
Special Agent
Homeland Security Investigations

Sworn to before me this
2nd day of November, 2016



THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK